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ATTORNEYS AT LAW
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December 5, 2003

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DEC - 5 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms Marlene H Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D C. 20554

Re Petition for Clarification or, in the Alternative, Waiver, filed November 26, 2003
CC Docket No 96-128

Dear Ms Dortch,

Submitted herewith is supplemental information designed to add the following companies as parties/petitioners to above-captioned "Petition for Clarification or, in the Alternative Waiver" ("Petition") filed November 26, 2003.

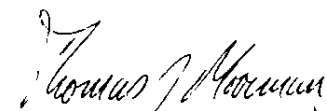
Chickamauga Telephone Corporation
Chickasaw Telephone Company
Clay County Rural Telephone Cooperative, Inc
Empire Telephone Corporation
Fulton Telephone Company, Inc
KLM Telephone Company
LaFourche Telephone Company, LLC

McDonough Telephone Cooperative
Mid-Century Telephone Cooperative
Midvale Telephone Exchange, Inc.
Peoples Rural Telephone Cooperative
Pine Belt Telephone Company, Inc.
Range Telephone Cooperative, Inc
Siskiyou Telephone Company
United Telephone Company

Also attached are the declarations for each of the companies along with a revised Attachment A reflecting the companies as parties/petitioners in this matter. The revised Attachment A corrects the State within which Roanoke Telephone Company operates. The corrected State is Alabama rather than Tennessee. Finally, the declaration of United Telephone Company ("United") notes that it received a request of compensation from APCC Services, Inc ("APCC") in March of this year, not in August, 2003. Other than the timing of the APCC request, United is similarly situated to other parties/petitioners.

Please direct any inquiries to the undersigned

Sincerely,


Thomas J. Moorman
No. of Copies rec'd 074
List ABCDE

Attachments

~~XXXXXXXXXXXXXXXXXXXX~~

Attachment

Page 1 of 3

Adams Telephone Co-Operative, Illinois
Alma Telephone Company, Georgia
The Armstrong Telephone Companies (for the states as noted)
Baldwin Telecom, Inc., Wisconsin
Bay Springs Telephone Company, Mississippi
Ben Lomand Rural Telephone Cooperative, Inc., Tennessee
Berkshire Telephone Corporation, New York
Brandenburg Telephone Company, Kentucky
Brantley Telephone Company, Inc , Georgia
Brazoria Telephone Company, Texas
Campti-Pleasant Hill Telephone Company, Inc , Louisiana
Canadian Valley Telephone Co , Oklahoma
Cascade Utilities, Inc , Oregon
Central Montana Communications, Inc , Montana.
CenturyTel, Inc. (for the states as noted)
Cherokee Telephone Company, Oklahoma
Chibardun Telephone Cooperative, Inc , Wisconsin
Chickamauga Telephone Corporation, Georgia
Chickasaw Telephone Company, Oklahoma
Cimarron Telephone Company, Oklahoma
Citizens Mutual Telephone Company, Iowa
Clay County Rural Telephone Cooperative, Inc., Indiana
Coastal Utilities, Inc , Georgia
Copper Valley Telephone, Inc., Arizona
Crockett Telephone Company, Tennessee
Cross Telephone Company, Oklahoma
Darien Telephone Company, Inc , Georgia
Decatur Telephone Company, Mississippi
Delta Telephone Company, Mississippi
Ducor Telephone Company, California
Duo County Telephone Cooperative, Kentucky
East Ascension Telephone Co LLC, Louisiana
Empire Telephone Corporation, New York
Foothills Rural Telephone Cooperative Corp , Inc , Kentucky
Franklin Telephone Company, Mississippi
Fulton Telephone Company, Inc , Mississippi
Garden Valley Telephone Company, Minnesota
Glenwood Telephone Company, Georgia
Grand River Telephone Corporation, Missouri
Green Hills Telephone Corporation, Missouri

Revised 12/05/03

Attachment A

Page 2 of 3

Gulf Telephone Company, Alabama
Hancock Telephone Company, New York
Hancock Rural Telephone Corp d/b/a Hancock Telecom, Indiana
Hinton Telephone Co, Inc., Oklahoma
KLM Telephone Company, Missouri
LaFourche Telephone Company, LLC, Louisiana
Loretel Systems, Inc , Minnesota
Margaretville Telephone Company, Inc , New York
McDonough Telephone Cooperative, Illinois
Mid-Century Telephone Cooperative, Illinois
The Middleburgh Telephone Company, New York
Midvale Telephone Exchange, Inc , Idaho
Millington Telephone Co , Inc , Tennessee
Missouri Valley Communications, Inc., Montana
Moundville Telephone Company, Inc , Alabama
National Telephone of Alabama, Alabama
Nemont Telephone Cooperative, Inc , Montana
New Ulm Telecom, Inc, Minnesota
Newport Telephone Company, Inc , New York
North Central Telephone Cooperative, Inc , Tennessee
Peoples Telephone Company, Tennessee
Peoples Rural Telephone Cooperative, Kentucky
Pine Belt Telephone Company, Alabama
Pioneer Telephone Cooperative, Inc , Oklahoma
Poka Lambro Telephone Cooperative, Inc., Texas
Price County Telephone Company, Wisconsin
Project Telephone Company, Montana
Range Telephone Cooperative, Inc , Montana
Ringgold Telephone Co., Georgia
Roanoke Telephone Company, Alabama
Ruthven Telephone Exchange Co., Iowa
SEI Communications, Indiana
Shidler Telephone Company, Oklahoma
Siskiyou Telephone Company, California
Smart City Telecommunications LLC/d/b/a Smart City Telecom, Florida
South Central Rural Telephone Cooperative Corp , Inc , Kentucky
Stayton Telephone Cooperative Telephone Co., Oregon
Rio Virgin Telephone Company, Nevada
Tohono O'odham Utility Authority, Arizona
Trans Cascades Telephone Company, Oregon

Revised 12/05/03

Attachment A

Page 3 of 3

Trenton Telephone Company, Georgia
Triangle Telephone Cooperative Assn., Inc., Montana
United Telephone Company, Tennessee
Valley Telecommunications, Inc., Montana
Valley Telephone Cooperative, Inc , Arizona
West Kentucky Rural Telephone Cooperative Corp., Kentucky
West Tennessee Telephone Company, Tennessee

Revised 12/5/03

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

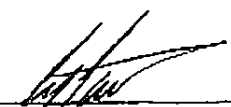
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Accordingly, when calls are made from any pay station in our service area, it is not possible for our company to handle a call that is compensable. Unlike the regional Bell Operating Companies or other local exchange carriers that provide intraLATA services on a compensable basis, our company provides only originating access service to other carriers. With respect to the traffic associated with the invoice received from APCC, we conclude that the compensable calls were handled by the intraLATA toll provider that is assigned to the paystation; no compensable calls were handled by our company.

I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: 12/03/03


(signature)

Cy Fail
(printed name)

President
(Title)

Company Name: Chickamauga Telephone Corporation

Company Address: P.O. Box 922

Bay Springs, MS 39422

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY


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When dial around calls and subscriber toll-free calls are made from payphones located in the Company's service area, we automatically route those calls from our central office to the toll provider (the Regional Bell Operating Company or other Interexchange Carrier) assigned the access code or the SXX number being dialed. This automatic routing is triggered by the end user dialing a "1" and occurs even where the call is ultimately terminated to an end user located within our service area. Once routed to the toll provider, however, the toll provider controls the routing of the call and how that call will be terminated. Unlike the regional Bell Operating Company, our company is not an intraLATA toll provider.

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Date: 01/2/03


(signature)

Thomas F Riley
(printed name)

SVR/COO
(Title)

Company Name: Chickasaw Telephone Co

Company Address: 5 N McCormick

OKC OK 73127

OKC OK 73127

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Accordingly, when calls are made from any pay station in our service area, it is not possible for our company to handle a call that is compensable. Unlike the regional Bell Operating Companies or other local exchange carriers that provide intraLATA services on a compensable basis, our company provides only originating access service to other carriers. With respect to the traffic associated with the invoice received from APCC, we conclude that the compensable calls were handled by the intraLATA toll provider that is assigned to the paystation; no compensable calls were handled by our company.

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Date December 5, 2003

Bradley W. Welp
(signature)

Bradley W. Welp
(printed name)

General Manager
(Title)

Company Name. Clay County Rural Telephone Cooperative

Company Address 2 S. West Street

P.O. Box 237

Cloverdale, Indiana 46120

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY


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Date: Dec 3, 2003


(signature)

BRIAN KETCHUM
(printed name)

V. Pres.
(Title)

Company Name: EMPIRE TEL. CORP.

Company Address: 34 MAIN ST.

PRATTSBURG, NY 14873

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 12/03/03


(signature)

Cy Fail
(printed name)

President
(Title)

Company Name: Fulton Telephone Company, Inc.

Company Address: P.O. Box 922

Bay Springs, MS 39422

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

The undersigned company is a rural telephone company that received a memorandum dated August 29, 2003 together with an attached invoice from APCC Services, Inc. on behalf of various Payphone Service Providers ("PSPs") that referenced the Federal Communications Commission decision from October, 2002 addressing compensation obligations to PSPs.

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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: 12/4/03

Bruce Copsey
(signature)

Bruce Copsey
(printed name)

Secretary
(Title)

Company Name: KLM TELEPHONE Company

Company Address: 616 E. PARK
RICH HILL, MO 64779

**DECLARATION OF PETITIONING
INCUMBENT RURAL TELEPHONE COMPANY**

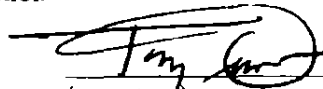
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Date 12-05-03


(signature)

Tony Duet
(printed name)

President
(Title)

Company Name Lafourche Telephone Company LLC

Company Address P.O. Box 188

LAROSE

LOUISIANA 70373

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

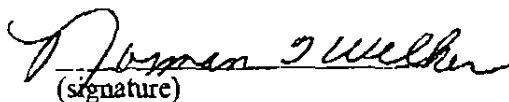
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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration

Date: 12-03-03


(signature)

NORMAN T. WELKER
(printed name)

PRESIDENT
(Title)

Company Name: MCDONOUGH TELEPHONE COOPERATIVE

Company Address: 210 NORTH COAL ST

PO BOX 359

COLCHESTER IL 62326

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

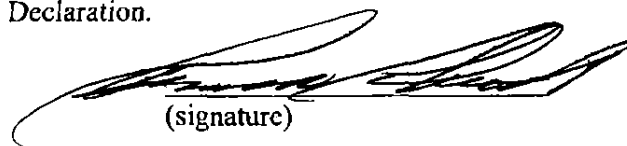
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Date: Dec 3, 03


(signature)

RUSSELL D. SCHNOOST
(printed name)

GENERAL MANAGER
(Title)

Company Name: MID CENTURY TELEPHONE COOPERATIVE

Company Address: P.O. Box 479

1055 WEST LOCUST

CANTON, IL 61520

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 12-4-03


(signature)

Karen J. Williams
(printed name)

Assistant Manager
(Title)

Company Name. Midvale Telephone Exchange, Inc.

Company Address: PO Box 7; Midvale, ID 83645

(208) 355-2211

(208) 355-2222 - fax

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

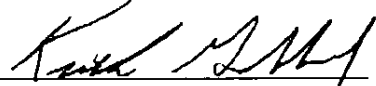
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Date. 12-5-03


(signature)

Keith Gabbard
(printed name)

Manager
(Title)

Company Name:

Peoples Rural Telephone

Company Address:

P.O. Box 159

Madison, AL 35704

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date 12/4/03

(signature)

John C. Nettles
(printed name)

President
(title)

Company Name Pine Belt Telephone Co., Inc.
Company Address 3984 County Rd. 32
Arlington, AL 36722

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 12-3-03

Robin Stephens
(signature)

Robin Stephens
(printed name)

CFO
(Title)

Company Name: Range Telephone Coop., Inc.

Company Address: P.O. Box 127

2325 E. Front St.

Forsyth, MO 65932

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

The undersigned company is a rural telephone company that received a memorandum dated August 29, 2003 together with an attached invoice from APCC Services, Inc. on behalf of various Payphone Service Providers ("PSPs") that referenced the Federal Communications Commission decision from October, 2002 addressing compensation obligations to PSPs.

When dial around calls and subscriber toll-free calls are made from payphones located in the Company's service area, we automatically route those calls from our central office to the toll provider (the Regional Bell Operating Company or other Interexchange Carrier) assigned the access code or the 8XX number being dialed. This automatic routing is triggered by the end user dialing a "1" and occurs even where the call is ultimately terminated to an end user located within our service area. Once routed to the toll provider, however, the toll provider controls the routing of the call and how that call will be terminated. Unlike the regional Bell Operating Company, our company is not an intraLATA toll provider

Accordingly, when calls are made from any pay station in our service area, it is not possible for our company to handle a call that is compensable. Unlike the regional Bell Operating Companies or other local exchange carriers that provide intraLATA services on a compensable basis, our company provides only originating access service to other carriers. With respect to the traffic associated with the invoice received from APCC, we conclude that the compensable calls were handled by the intraLATA toll provider that is assigned to the paystation; no compensable calls were handled by our company.

I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: 12-03-03

James T. Lowers
(signature)

James T. Lowers
(printed name)

President
(Title)

Company Name: Siskiyou Telephone Co.

Company Address: P.O. Box 157

Etna, CA 96027

NO 4572 P. 2

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

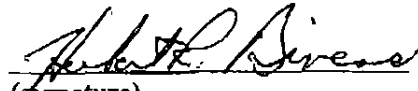
The undersigned company is a rural telephone company that received a letter dated March 10, 2003 together with an attached invoice from APCC Services, Inc. on behalf of various Payphone Service Providers ("PSPs") that referenced the Federal Communications Commission decision from October, 2002 addressing compensation obligations to PSPs.

When dial around calls and subscriber toll-free calls are made from payphones located in the Company's service area, we automatically route those calls from our central office to the toll provider (the Regional Bell Operating Company or other Interexchange Carrier) assigned the access code or the 8XX number being dialed. This automatic routing is triggered by the end user dialing a "1" and occurs even where the call is ultimately terminated to an end user located within our service area. Once routed to the toll provider, however, the toll provider controls the routing of the call and how that call will be terminated. Unlike the regional Bell Operating Company, our company is not an intraLATA toll provider.

Accordingly, when calls are made from any pay station in our service area, it is not possible for our company to handle a call that is compensable. Unlike the regional Bell Operating Companies or other local exchange carriers that provide intraLATA services on a compensable basis, our company provides only originating access service to other carriers. With respect to the traffic associated with the invoice received from APCC, we conclude that the compensable calls were handled by the intraLATA toll provider that is assigned to the paystation; no compensable calls were handled by our company.

I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration

Date: 12/4/2003


(signature)

HERBERT R. BIVENS
(printed name)

GEN. MANAGER
(Title)

Company Name: UNITED TELEPHONE COMPANY

Company Address: P.O. BOX 38

CHAPEL HILL, TN 37034

CERTIFICATE OF SERVICE

I, Kellie Breedlove, of Kraskin, Lesse & Cosson, LLC, 2120 L Street, NW, Suite 520, Washington, DC 20037, do hereby certify that a copy of the foregoing supplement to the "Petition for Clarification or, in the Alternative, Waiver" was served on this 5th day of December 2003, to the following parties


Kellie Breedlove

William Maher, Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
(Hand Delivered)

Qualex International
445 12th Street, SW
Room CY-B402
Washington, DC 20554
(Hand Delivered)

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